

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

KIMBERLY HARSMAN, *et. al.*,

) Case No: 1:21-cv-00597

Plaintiffs,

) JUDGE BLACK

V.

) **DEFENDANTS UC HEALTH, LLC,**  
) **UNIVERSITY OF CINCINNATI**  
) **MEDICAL CENTER, LLC, AND**  
) **UNIVERSITY OF CINCINNATI**  
) **PHYSICIANS COMPANY, LLC'S**  
) **MEMORANDUM IN OPPOSITION**  
) **TO PLAINTIFFS' MOTION TO**  
) **REMAND**

**CINCINNATI CHILDREN'S HOSPITAL  
MEDICAL CENTER, *et al.*,**

## Defendants.

) **MEMORANDUM IN OPPOSITION  
TO PLAINTIFFS' MOTION TO  
REMAND**

Defendants UC Health, LLC (“UC Health”), University of Cincinnati Medical Center, LLC (“UCMC”), and University of Cincinnati Physicians Company, LLC (“UCPC”) oppose Plaintiffs’ Motion for Remand for all the reasons asserted in the Mercy Defendants’ Memorandum in Opposition to Plaintiff’s Motion for Remand. (Doc. 32) To the extent required, attached as Exhibit 1 is a declaration. Defendants do not know at this stage who will be refusing the vaccine, or who have received but felt threatened or coerced to receive the vaccine or who may be subject to disciplinary action.

For each and every of the reasons asserted in the Mercy Defendants' Memorandum in Opposition to Plaintiffs' Motion for Remand and those above, Defendants UC Health, LLC, University of Cincinnati Medical Center, LLC, and University of Cincinnati Physicians Company, LLC respectfully request that the Court deny Plaintiffs' Motion for Remand.

Respectfully submitted,

/s/ Patricia Anderson Pryor  
Patricia Anderson Pryor (0069545)  
JACKSON LEWIS P.C.  
201 E. Fifth Street, 26<sup>th</sup> Floor  
Cincinnati, OH 45202  
Telephone: (513) 898-0050  
Facsimile: (513) 898-0051  
patricia.pryor@jacksonlewis.com

*Counsel for Defendants UC Health, LLC,  
University of Cincinnati Medical Center, LLC  
and University of Cincinnati Physicians  
Company, LLC (“UCPC”)*

## CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2021, a true and accurate copy of the foregoing was electronically filed with the Court's CM/ECF system, and such system will send electronic notice to all counsel of record.

*/s/ Patricia Anderson Pryor*

Patricia Anderson Pryor (0069545)

4852-8346-2652, v. 1